

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

)	
FERRING PHARMACEUTICALS INC.,)	
)	
Plaintiff and)	
Counterclaim-Defendant,)	
)	
v.)	Civil Action No. 13-cv-12553-NMG
)	
BRAINTREE LABORATORIES, INC.,)	
)	
Defendant and)	
Counterclaim-Plaintiff.)	
)	

**EMERGENCY MOTION BY DEFENDANT AND COUNTERCLAIM-PLAINTIFF
BRAINTREE LABORATORIES, INC. FOR AN EXTENSION OF TIME TO RESPOND
TO MOTION TO COMPEL DUE TO FERRING'S FAILURE TO MEET AND CONFER**

Defendant and counterclaim-plaintiff Braintree Laboratories, Inc. respectfully submits this emergency motion for an extension of time to respond to the Motion to Compel filed by plaintiff and counterclaim-defendant Ferring Pharmaceuticals Inc., in order to permit a meet and confer effort. Braintree brings this motion on an emergency basis because otherwise it would be forced to respond to a motion to compel that was filed without the requisite meet-and-confer effort to narrow or resolve the dispute.

For the reasons provided in the accompanying memorandum in support of this emergency motion, Braintree respectfully requests that the Court extend the time within which it may respond to Ferring's Motion to Compel so that the parties can make a good faith effort to narrow or resolve issues. Ferring should also be compelled to respond substantively to Braintree's July 6, 2015 letter, including the need to clarify its boilerplate objections.

Dated: July 31, 2015

Respectfully submitted,

/s/ Joshua L. Solomon

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/s/ Joshua L. Solomon